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TRANS UNION, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BRIAN DOUGLAS LARSON, on behalf
of himself and all others similarly situated,

Plaintiff,

v.

TRANS UNION, LLC,

Defendant.

Case No. 3:12-cv-05726-WHO

[Assigned to the Hon. William H. Orrick]

**DECLARATION OF JAMES GARST IN
SUPPORT OF DEFENDANT TRANS
UNION LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

STROOCK & STROOCK & LAVAN LLP
2029 Century Park East
Los Angeles, California 90067-3086

I, JAMES GARST, hereby declare and state as follows:

1. I am an employee of Trans Union LLC ("TransUnion"). I am currently a Data Governance Senior Advisor at TransUnion and have held various positions at TransUnion for approximately 12 years. I submit this Declaration in support of TransUnion's Administrative Motion to File Under Seal redacted portions of Exhibits B, C, and G of the Declaration of Stephen Newman ("Newman Declaration"), and TransUnion's Opposition to plaintiff Brian Douglas Larson's ("Plaintiff") Motion for Class Certification ("Opposition"). Except where based upon my review of records and documents regularly created and maintained in TransUnion's ordinary course of business, all of the matters set forth herein are of my own personal knowledge and, if called as a witness, I could and would competently testify thereto.

2. I have reviewed Exhibits B, C, and G, and the Opposition. The redacted portions of these documents contain highly confidential information considered by TransUnion to be competitively-sensitive trade secrets.

3. The credit reporting industry is highly competitive and release of the information in these Exhibits could be used by TransUnion's competitors to its disadvantage. Credit reporting agencies frequently analyze their competitors' behavior and results to capitalize on opportunities to reach customers and improve services. TransUnion's non-public financial data, internal analysis and business strategies provide valuable intelligence in positioning a competitor's own products, marketing and strategies.

4. Exhibit B consists of excerpts from my deposition transcript in this action. The redacted portions contain competitively sensitive numbers and information that TransUnion protects from competitors.

5. Exhibit C consists of excerpts of the deposition testimony of TransUnion employee Brian Thackrey. The redacted portion addresses the hourly rate paid to certain contractors, which is competitively sensitive information that TransUnion protects from competitors.

6. Exhibit G is the Declaration of Victor Stango filed by TransUnion in Ronald J. Miller v. Trans Union, LLC, pending in the United States District Court for the Middle District of Pennsylvania, Case No. 3:12-cv-01715-WJN-MCC. The redacted portions of Exhibit G, and the

1 Opposition's citations to the same, contain competitively sensitive numbers and information that
2 TransUnion protects from competitors.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed this 1st day of April 2015, at Chicago, Illinois.

6 
7 James Garst

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CERTIFICATE OF SERVICE

I hereby certify that, on April 3, 2015, a copy of the foregoing **DECLARATION OF JAMES GARST IN SUPPORT OF DEFENDANT TRANS UNION LLC'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL** was filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

/s/ Stephen J. Newman
Stephen J. Newman

DECLARATION OF JAMES GARST